IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 15

CHIARO TECHNOLOGY LIMITED (in Administration),¹

Case No. 25-10691 (BLS)

Debtor in a Foreign Proceeding.

NOTICE OF FILING OF BANKRUPTCY PETITION AND RELATED PLEADINGS; NOTICE AND AGENDA OF HEARING ON FIRST DAY MOTIONS SCHEDULED FOR APRIL 15, 2025, AT 11:00 A.M. (ET) IN COURTROOM #1

This proceeding will be a hybrid proceeding with DE/local counsel appearing in the courtroom and outside parties participating via Zoom.

Please refer to Judge Shannon's Chambers Procedures and the Court's website (http://www.deb.uscourts.gov/ecourt-appearances) for information on the method of allowed participation (video or audio), Judge Shannon's expectations of remote participants, and the advance registration requirements.

Registration is required at least 2 hours in advance of the hearing, using the eCourt Appearances tool available on the Court's website.

PLEASE TAKE NOTICE that, on April 11, 2025, Lindsay Hallam, Matthew Boyd Callaghan, and Oliver Wright of FTI Consulting LLP, in their capacity as the duly authorized joint administrators (the "<u>Foreign Representatives</u>") of Chiaro Technology Limited (in Administration) (the "<u>Foreign Debtor</u>"), filed a petition for relief under chapter 15 of title 11 of the United States Code and elected to proceed as set forth below:

1

The Foreign Debtor's mailing address and principal place of business is 1 Brunswick Square, Bristol BS2 8PE, England.

A. Voluntary Petition

1. Chiaro Technology Limited (in Administration) [Case No. 25-10691 (BLS) [D.I. 1].

PLEASE TAKE FURTHER NOTICE that, in addition to the filing of their petition, the Foreign Representatives have filed the following motions and related pleadings:

B. Provisional Relief Motions

- 1. Motion of the Foreign Representatives for Provisional Relief Under Section 1519 of the Bankruptcy Code [D.I. 3] (the "Provisional Relief Motion").
- 2. Memorandum of Law in Support of Motion for Provisional Relief Under Section 1519 of the Bankruptcy Code [D.I. 4].
- 3. Motion to Approve/Motion of the Foreign Representatives for Entry of an Order (A) Scheduling a Hearing on Chapter 15 Petition and Recognition, and (B) Specifying Form and Manner of Service of Notice [D.I. 10].

C. Recognition Motions

- 4. Motion of the Foreign Representatives for Recognition and Related Relief [D.I. 5].
- 5. Memorandum of Law in Support of Motion of the Foreign Representatives for Recognition and Related Relief [D.I. 6].
- 6. Verified Petition for Recognition and Related Relief [D.I. 7].
- 7. Declaration of James Davison Regarding Foreign Law in Support of the Verified Petition for Recognition and Related Relief [D.I. 8].
- 8. Declaration of Lindsay Hallam in Support of the Verified Petition for Recognition and Related Relief [D.I. 9].

PLEASE TAKE FURTHER NOTICE that a hearing (the "Provisional Relief Hearing") with respect to the Provisional Relief Motion is scheduled for <u>April 15, 2025, at 11:00 a.m. (ET)</u> before the Honorable Brendan L. Shannon at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Courtroom #1, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that any and all objections to the Provisional Relief Motion may be made at or before the Provisional Relief Hearing.

Dated: April 14, 2025 Wilmington, Delaware Respectfully submitted,

DLA PIPER LLP (US)

/s/ R. Craig Martin

R. Craig Martin (DE 5032) Roxanne M. Eastes (DE 6654) 1201 North Market Street, Suite 2100 Wilmington, Delaware 19801 Telephone: (302) 468-5700

Telephone: (302) 468-5700 Facsimile: (302) 394-2462

Email: craig.martin@us.dlapiper.com roxanne.eastes@us.dlapiper.com

- and -

Erik F. Stier (*pro hac vice* forthcoming) 500 Eighth Street, N.W. Washington, DC 20004 Telephone: (202) 799-4000

Facsimile: (202) 799-5000

Email: erik.stier@us.dlapiper.com

Counsel to the Foreign Debtor